

**UNITED STATES DISTRICT COURT
OF THE DISTRICT OF NEW JERSEY**

DEMODULATION, INC.,

Plaintiff,

v.

CORNING, INC. ET AL.,

Defendants.

Civil Action No. 11-296 (WJM)

NOTICE OF CROSS-MOTION TO QUASH AND FOR SANCTIONS

PLEASE TAKE NOTICE that on March 17, 2014, at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for non-party Rudolph W. Giuliani, shall cross-move, pursuant to Fed. R. Civ. P. 45, before the United States District Court for the District of New Jersey at the Martin Luther King Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07101-0999, for the entry of an Order quashing the subpoena served upon non-party Rudolph W. Giuliani.

PLEASE TAKE FURTHER NOTICE that, in support of the within Cross-Motion to Quash and for Sanctions, the undersigned shall rely on the Memorandum of Law in Opposition to Plaintiff's Motion to Enforce Non-Party Subpoenas and in Support of Rudolph W. Giuliani's Cross-Motion to Quash and for Sanctions, Affirmation of Seth M. Cohen in Opposition to Plaintiff's Motion to Compel and in Support of Cross-Motion to Quash, and Declaration of Rudolph W. Giuliani submitted herewith. A proposed form of Order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is respectfully requested on this motion if opposition is received by the Court.

Dated: March 3, 2014

Respectfully submitted,

By: /s/Ryan M. Philp

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